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September 14, 2020

**VIA ECF**

Hon. Edgardo Ramos  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

Re: *D.M. obo N.M. v. N.Y.C. Dep't of Educ.*, 20-cv-6851(ER)(OTW)

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the office of Corporation Counsel James E. Johnson, attorney for Defendant in the above-referenced action wherein Plaintiff seeks attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act, 20 U.S.C. §1400, *et seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 60-day extension of Defendant's time to respond to the complaint. This is the first request for an extension of the September 17, 2020 answer deadline in this case. Plaintiff consents to the request. The need for the extension is to provide Defendant with additional time to review updated billing records provided by Plaintiff's attorney, to review underlying administrative records, and work toward possible settlement.

Accordingly, Defendant respectfully requests that its time to respond to the complaint be extended to November 17, 2020, or a date thereafter convenient for the Court.

Thank you for considering this request.

Respectfully submitted,  
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Martin Bowe  
Senior Counsel

cc: Adam Dayan, Esq (via ECF)